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John Borghese, District M	e Official/Title/Phone and Fax Number	Contacted ✓ Yes □ No	descriptive information) SIC = 4212 Lat.: 47.560325 Long.: -122.335322	, SIC NAICS, and other
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• • • • • • • •		See the attached	d report.	MAY 2 9 2012

Inspection & Enforcement Management Unit (IEMU) Name(s) and Signature(s) of Inspector(s) Agency/Office/Phone and Fax Numbers Date Joseph S. Roberto EPA/OCE/206-553-1669 05/29/12 Signature of Management Q A Reviewer Agency/Office/Phone and Fax Numbers Date EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

NPDES Inspection Report

Waste Management Disposal Services of Oregon, Inc. (Alaska Street Reload)

Seattle, Washington

March 7, 2012

Prepared by:
Joe Roberto, Environmental Engineer
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
NPDES Compliance Unit

RECEIVED

MAY 2 9 2012

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I.

Facility Information

(Unless otherwise noted, all details in this inspection report were obtained from:

• an interview of John Borghese at the time of the inspection, and

• observations made at the time of the inspection.)

I. Facility Information

Facility Name:

Waste Management Disposal Services of Oregon,

Inc. (Alaska Street Reload)

Facility Type:

Truck to Rail Transfer Facility for non-Hazardous

Contaminated Soils, Sludges, Drummed and

Recyclable Materials

Facility Address:

70 South Alaska Street

Seattle, Washington 98134

King County

Mailing Address:

18177 Cedar Springs Lane

Arlington, Oregon 97812

w P

Facility Contact(s):

John Borghese (District Manager)

Jeff Altmann (NW Environmental Manager)

Facility Phone #s:

(206) 763-5025

II. Inspection Information

Inspection Date:

March 7, 2012

Arrival Time:

8:30 AM

Departure Time:

12:15 PM

Weather:

Sunny and Dry

Purpose:

Determination of Compliance with the Industrial

Storm Water General Permit and the Clean Water

Act

III. Permit Information

This facility is covered by the Washington Industrial Storm Water General Permit (Permit # WAR004605). The Alaska Street Reload facility was issued this permit

on October 21, 2009. See attachment A for a copy of the screen from the Washington Department of Ecology (Ecology) Paris database indicating the permit issuance date.

IV. Individuals Present

The inspection team for this inspection consisted of me (Joe Roberto, EPA) and Robert Wright with Ecology. I was the team lead. Mr. Wright provided technical assistance as needed throughout the inspection.

The facility representative present during the inspection was John Borghese.

V. Inspection Entry

This was an unannounced inspection. I presented my credentials to Mr. Borghese upon arriving at the facility. After initial introductions, I explained the purpose of the site visit to Mr. Borghese.

Mr. Borghese did not deny us access to the facility. We were allowed to inspect all areas that we wished to inspect. Mr. Borghese accompanied the inspection team throughout the inspection.

VI. Inspection Chronology

Upon arriving at the facility we began the inspection with an opening conference where we discussed the purpose and expectations of the inspection. Following the opening conference, I interviewed Mr. Borghese about operations at the facility and conducted a review of available file information.

We then conducted a facility tour where we inspected the areas exposed to precipitation and the likely drainage pathways from these areas. We also paid particular attention to the wheel wash area that all trucks must drive through before leaving the facility.

As part of the inspection, I came prepared to collect samples of wastewater or stormwater discharges from the facility. However, I did not collect samples at the time of this inspection.

We concluded the inspection with a closing conference where I discussed the areas of concern I identified during the inspection.

VII. Owner and Operator Information

According to Mr. Borghese, the operator of this facility is Waste Management Disposal Services of Oregon, Inc. He indicated that this company owns the rail cars used to haul materials from the facility. He also indicated that this company leases the property and buildings from Alaska Copper and Brass.

VIII. Background and Activity

According to the facility SWPPP, the Alaska Street Reload facility is a transfer facility for non-hazardous contaminated soils, sludges, drummed and recyclable materials. The operation of this facility is such that contaminated materials are brought to the facility by truck. The trucks are weighed and then routed to an area within one of the building structures where the truck contents are emptied. Once emptied, the trucks are routed through a wheel wash system prior to leaving the facility.

The contaminated materials are ultimately loaded on to rail cars and hauled offsite for ultimate disposition.

According to the SWPPP, this facility also operates as a Ten-Day Storage Facility Transporter for dangerous wastes which are trans-loaded and shipped to a designated facility located in Arlington, Oregon.

Available file information suggests that a long term concern at this facility has been the track out of material from the truck wheel wash area. File information, including Ecology inspection photographs taken in January 2009 and October 2010, indicate that process wastewater from the wheel wash facility has been tracked out and discharged into storm drains located just north of the facility boundary along Alaska Street. See attachment E of this report for details of these past discharges.

IX. Stormwater Management

Based on observations of the facility, it appears that most of the materials stored at this facility are kept in one of the building structures and not exposed to precipitation. The areas exposed to precipitation include the truck wheel wash area, the truck scale, and other areas travelled and used by trucks for parking as access.

The bulk of the stormwater falling on this facility appears to be collected and either treated with catch basin inserts prior to discharge offsite or collected and used in the wheel wash system. This facility is plumbed such that stormwater can be discharge offsite through one of two discharge outfalls (outfall A and B).

However, according to John Borghese, outfall A is no longer used as a discharge point. All collected stormwater is now routed through outfall B.

See attachment B of this report for the approximate outfall locations. See also photograph #s 2, 3, 10, and 13 to 16 of attachment C for details of the stormwater collection system.

X. Truck Wheel Wash Discharges

At the time of the inspection, I questioned Mr. Borghese about the track out/discharge concerns associated with the truck wheel wash. Mr. Borghese said that they did have a discharge from the truck wash on November 17, 2011. He said that the discharge was caused by a malfunction in the system which resulted from grit in the materials being trucked into the facility at that time. This malfunction resulted in an overflow of process wastewater from the truck wheel wash area. According to Mr. Borghese, this overflow flowed to the north and discharged into a storm drain along Alaska Street. See attachment D of this report for details of this discharge.

In addition to the overflow discharge mentioned above, it appears that the potential also exists for wheel wash wastewater to enter nearby storm drains via the track out of wheel wash water by trucks leaving the facility. The potential for discharge is suggested by my observations at the time of the inspection. Although the weather was clear and dry at the time of the inspection, I saw a trail of wet pavement leading north from the wheel wash to the property boundary along Alaska Street. See photograph #s 8 and 10 to 12 of attachment C for details of the material track out at the time of the inspection. Note that material from the wheel wash is being tracked out to an area in the vicinity of two storm drains along Alaska Street (located an estimated 80 feet away from the wheel wash). Although I did not see the wet pavement lead all the way to the storm drains at the time of the inspection, the area of the tracked out material does slope towards the storm drains creating the potential for discharge.

XI. Receiving Water

According to information obtained from Seattle Public Utilities, the storm drains that received the wheel wash discharges mentioned above (located north of the facility boundary) ultimately flows to the Duwamish River. The distance from these storm drains to the Duwamish River is just over a half mile.

XII. Sample Collection and Analyses

As indicated above, I did not collect any samples at the time of this inspection.

XIII. Areas of Concern

We inspected the facility including the interior and exterior of the building structure as well as the stormwater handling practices. I saw several areas of concern at the time of the inspection. These areas of concern are described as follows:

A. Wheel Wash Overflow Discharge At the time of the inspection, I asked Mr. Borghese about any past discharges from the wheel wash to nearby storm drains. Mr. Borghese said that they did have an overflow from the wheel wash on November 17, 2011. This overflow flowed north into a nearby storm drain just north of the facility's north fence line. Mr. Borghese indicated that the wheel wash system failed because of a buildup of grit in the system as well as the washing of too many trucks during this time period.

At the time of the inspection, I asked Mr. Borghese for documentation outlining the wheel wash discharge event and the company's efforts to cease the discharge. In an email, dated March 23, 2012, Yemaya Evans (with Waste Management) sent an incident report which documents the above mentioned discharge. This incident report is included as attachment D to this inspection report.

Note that at the time of the inspection I asked Mr. Borghese how long the discharge occurred. He indicated that he thought the discharge occurred on one day. Discussions with Robert Wright with Ecology, however, suggest that the discharge occurred over a two day period. Mr. Wright said that he was at the facility on November 16 and 17, 2011 and that he observed discharges from the wheel wash to the nearby storm drain on both days. Documentation of Mr. Wrights observations on each of these days is included in attachment E of this report.

B. Wheel Wash Track Out suggested that process wastewater from the truck wheel wash at this facility was being tracked out by trucks as they exit the facility. In addition, this information indicated that the material being tracked out could enter storm drains along Alaska Street. See attachment E for copies of photographs taken by Robert Wright with Ecology for details regarding past concerns of track out at this facility. These photographs suggest that track out from this facility has been documented as early as January 2009 and October 2010.

At the time of the inspection, I inspected the area in the vicinity of the wheel wash. As indicated above, I saw a trail of wet pavement leading from the wheel wash area to the northern property boundary along Alaska Street. Note that this pavement was wet even though the weather

condition on the day of the inspection was clear and dry. Also note that the wet pavement ended only several feet from storm drains located along Alaska Street.

The concern is that material being tracked out from this facility may be entering nearby storm drains during rain events. I raised this concern to Mr. Borghese at the time of the inspection and he indicated that the company is already looking at modifying the truck traffic flow path to deal with this concern.

C. <u>Effluent Sample Results</u> As indicated above, this facility is covered by the Industrial Storm Water General Permit (permit # WAR004605). This permit specifies that stormwater discharges from facilities be sampled quarterly and analyzed for certain parameters. This permit also establishes benchmark values for these parameters. The permit specifies that if the quarterly samples exceed the benchmark values at least three out of the four quarters in a year then treatment must be installed in order to achieve these benchmark values.

In addition, if treatment is required, the treatment system must be installed by September of the year following the three or four quarterly benchmark exceedances.

The discharge monitoring reports submitted by Waste Management indicate that the zinc benchmark value was exceeded at least three out of the four quarters in 2010. As a result, treatment would have been required to be installed by September 2011.

At the time of the inspection, Mr. Borghese indicated that the treatment selected and installed at this facility is catch basin filter inserts. These filter inserts were required to be installed by September 30, 2011. Note that sample results for samples collected after the treatment system installation showed reduced zinc levels, however, the benchmark zinc value was still exceeded.

See attachment F for copies of the quarterly discharge monitoring reports since the first quarter of 2010. Also see attachment G for information on the treatment system installed at this facility.

XIV. Closing Conference

Prior to leaving the facility, I concluded the inspection with a closing conference. The individuals present for the closing conference were myself (Joe Roberto), Robert Wright, and John Borghese. At the time of this closing conference I informed Mr. Borghese about the areas of concern identified above.

In addition, upon completing my review of the information obtained during the inspection, I contacted Mr. Borghese by phone to further discuss the areas of concern.

Report Completion Date:

Lead Inspector Signature:

Attachment A

Ecology Paris Database Showing Permit Issuance Information



Water Quality Permitting and Reporting Information System (PARIS)

Facility Details

Close Window

Links

Affiliations Communications DMR Data Documents Enforcements Industrial Class Inspections Limits/Benchmarks Outfalls

Permits Submittals Public Notices Violations ** Printer View **

Facility Details

Facility Site Name Alaska Street Reload & Recyling

Address

70 S ALASKA ST

City

Seattle 98134

Zip County

King

WRIA

Latitude Decimal 47.560361 Longitude Decimal-122.335833



- Active Outfall - Inactive Outfall - Facility Hover over the colored circles for additional details. You may need to zoom out to view the outfalls View Full Sized Map (Opens New Window)

Permits

Water Quality Name	Permit Type	Permit Number	Version	Status	Permit Sub Status	Facility Status	Issue Date	Effective Date	Expir
ALASKA STREET RELOAD & RECYCLING	Industrial SW GP	WAR004605	3	Active	Coverage Issued	Active	10/21/2009	01/01/2010	01/0:
ALASKA STREET RELOAD & RECYCLING	Industrial SW GP	SO3004605	2	Inactive	Inactive	Active	08/21/2002	09/20/2002	05/3:
ALASKA STREET RELOAD & RECYCLING	Industrial SW GP	SO3004605	1	Inactive	Inactive	Active	10/04/2000	07/17/2002	11/1
Pownload Data							-		

0.10 Seconds (3 Records)

Public Notices

No public notice data found for this facility 0.19 Seconds (0 Records)

Related Permits

No related permits found. 0.80 Seconds (0 Records)

Milestones

no data found 0.18 Seconds (0 Records)

Industrial Class

Permit Type	Permit Number	Version 🔻	Industrial Class	Class Code	Class Name
Industrial SW GP	S03004605	1	SIC	4212	LOCAL TRUCKING, WITHOUT STORAGE
Industrial SW GP	SO3004605	1	SIC	4953	REFUSE SYSTEMS
Industrial SW GP	S03004605	1	SIC	4959	SANITARY SERVICES, NEC
Industrial SW GP	SO3004605	2	SIC	4212	LOCAL TRUCKING, WITHOUT STORAGE
Industrial SW GP	S03004605	2	SIC	4953	REFUSE SYSTEMS
Industrial SW GP	S03004605	2	SIC	4959	SANITARY SERVICES, NEC
Industrial SW GP	WAR004605	3	SIC	4212	LOCAL TRUCKING, WITHOUT STORAGE
Industrial SW GP	WAR004605	3	SIC	4953	REFUSE SYSTEMS
Industrial SW GP	WAR004605	3	SIC	4959	SANITARÝ SERVICES, NEC

Download This Table

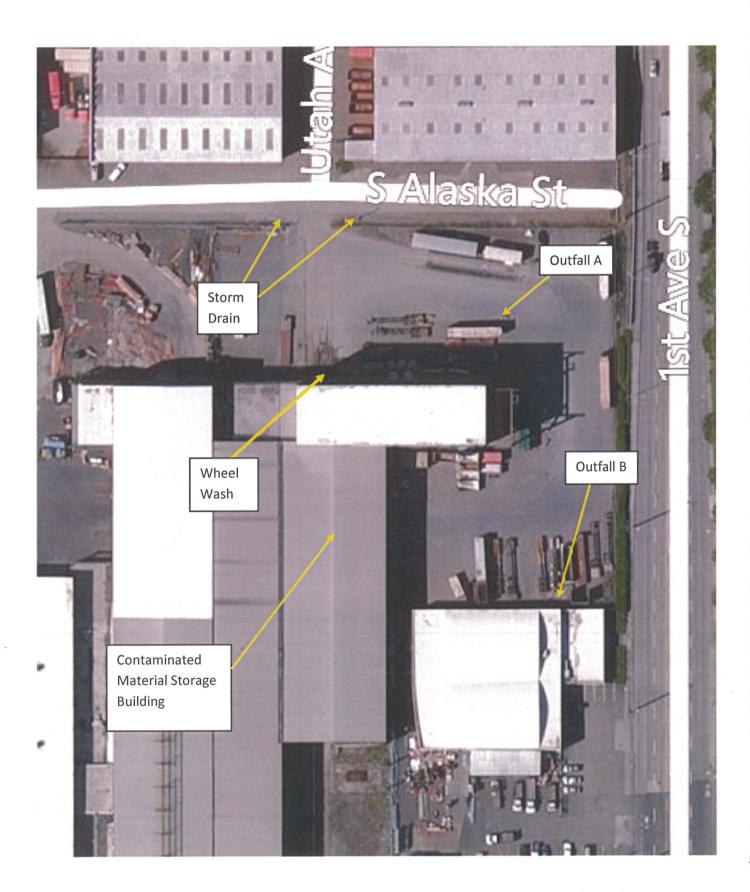
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Attachment B

Aerial Photograph

Waste Management Disposal Services of Oregon, Inc.



Attachment C

Photograph Documentation

(All photographs were taken by Joe Roberto on March 7, 2012)

Waste Management Disposal Services of Oregon, Inc.



Photo #1: View of the sign at the Alaska Street Relaod facility.



Photo #2: Westerly view showing the scale used to weigh trucks entering the facility.

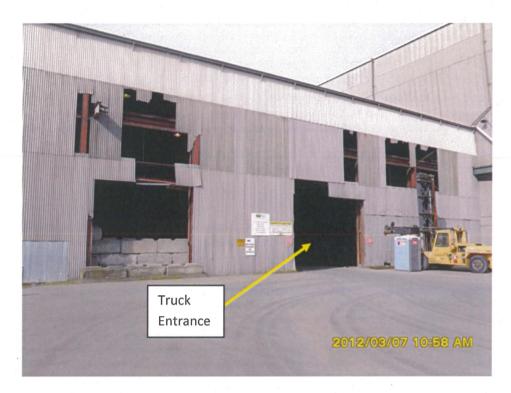


Photo #3: View of the building which houses the contaminated materials brought to the facility. Note the truck entrance to the building.



Photo #4: Southerly view showing the area just inside the entrance to the building. This building houses the contaminated materials.



Photo #5: Another southerly view showing the inside of the contaminated material storage building.



Photo #6: Northerly view from within the contaminated material storage building. Note the wheel wash area in the center of the photograph.



Photo #7: View of the wheel wash showing the end of a wash cycle.



Photo #8: Close-up of the truck wheel wash. Note the wet pavement beyond the wheel wash area.



Photo #9: View of the truck wheel wash water treatment system.



Photo #10: Northerly view showing wastewater from the wheel wash being tracked out the north entrance to the facility. Note the stormwater drains situated just outside the fence on the left (west) and right (east) side of the entrance to the facility. The photographer is standing in the vicinity of the wheel wash.



Photo #11: Westerly view showing the storm drain just outside of and west of the facility entrance along Alaska Street. The facility is situated to the left of this photograph.



Photo #12: Easterly view showing the storm drain just outside of and east of the facility entrance along Alaska Street. The facility is situated to the right of this photograph.



Photo #13: View of sample point A (outfall A). This drain was used in the past to route stormwater from the facility to the stormwater system. According to Mr. John Borghese, water entering this drain is now only routed to either the truck wheel wash system or it is routed to sample point B (outfall B).



Photo #14: View of sample point B (outfall B). This is the only stormwater discharge point remaining at the facility.



Photo #15: View of the one of the catch basin inserts used at this facility.



Photo #16: Another view of one of the catch basin inserts at this facility.

Attachment D

Waste Management Incident Report

Waste Management Disposal Services of Oregon, Inc.



CYCLE Incident Detail



Group: Western

MA: WM of Pacific Northwest BC BU ID: B02565

Site: S05124 - Alaska Street Re-Load and Recycling Facility Incident: 63585

Incident ID:63585

Incident Date: 12/13/2011
Incident Time: 10:00 am

Incident Location: S05124 - Alaska Street Re-Load and Recycling Facility

Contact Name:

Jeff Altman

Contact Email:

jaltman2@wm.com

Contact Phone:

253.509.0375

Incident Type	Incident Category	Incident Detail
Agency Action / Violation	Agency Identified Violation	Formal Written Correspondence

Incident Description: Site received an NOV from Seattle Public Utilities for violation of the City Stormwater Code (SMC 22.802.020.A - Prohibited Discharges). On November 17, 2011 SPU documented track out and wastewater discharge occurring from the site into Alaska Street. Conditions were due to a broken wheel wash system, resulting in the track out of turbid water and industrial process water to the public drainage control system.

Attachments

Seattle Public Utilities NOV

Remitted Penalty Check

Corrective Action No:1

Corrective Status: Completed

Action Date:11/17/2011

Date Corrected:01/05/2012



CYCLE Incident Detail



Group: Western

MA: WM of Pacific Northwest BC BU ID: B02565

Site: S05124 - Alaska Street Re-Load and Recycling Facility Incident: 63585

Corrective Action Taken: The Site Manager hired a spill response contractor to clean City catch basins on Alaska Street. A rotary brush sweeper also brought on scene to push track-out material in the street back onto the property and out of the entrance area. The facility operations where temporarily shut down to alleviate the overflow from the wheel wash. The response contractor used a vactor truck to clean impacted catch basins and drainage lines. The wheel system was repaired and back in operation later in the day on 11/17.

The NOV included a \$1000 penalty for the violation, due by 1/8/2012. A check request has been made and being processed.

Penalty payment was submitted to the City. A copy of the remitted check is attached.

Preventive Action Taken: Site manager will ensure trackout does not occur. Adding site upgrades (structural BMPs) is also being evaluated.

Evans, Yemaya

From:

Borghese, John

Sent:

Wednesday, March 21, 2012 10:59 AM

To: Subject: Evans, Yemaya FW: Notes

Pls print.

From: Borghese, John

Sent: Thursday, November 17, 2011 7:09 PM

To: Altman, Jeff Subject: Notes

AT 2:20 pm, Robert Wright from the DOE (water quality program) came into the Alaska Street Scale house and told me we were letting process water from the wheel wash drain into the catch basin. We stopped dumping truck right away. The wheel wash had backed up due to the nature of the material we were accepting from the tunnel-boring project.

We took our sweeper, swept the water away from the drains, and stopped the water immediately. We called in a vac truck, which arrived at 2:50 pm and had all three-storm water drains vacuumed out. We then had the lines jetted.

Robert was accompanied by Eric Autry from the city of Seattle.

Timothy McDonald from the city of Seattle (compliance inspector) was also there to oversee what we were doing completed his forms at 5:30 pm. He will email his notes and forms. Robert told me he would be sending a letter and we may be paying penalties for tracking and water going into the storm water drains. We will also see something from the City of Seattle.

Evans, Yemaya

From: Sent:

Borghese, John

Wednesday, March 21, 2012 9:29 AM Evans, Yemaya FW: Alaska Street

To: Subject:

Please print

From: Borghese, John

Sent: Friday, November 18, 2011 6:42 AM To: row461@ecy.gov; eric.autry@seattle.gov

Cc: Altman, Jeff

Subject: Alaska Street

Robert,

As requested.

The Vac truck arrived at Alaska Street at 2:50 pm. All three catch basins were vacuumed. The lines were also jetted out. thx

MARINE VACUUM SERVICE, INC.

INVOICE

PO BOX 24263 SEATTLE, WA 98124

Phone # Fax #

Phone # 206-762-0240

ACCOUNTING@MARINEVACUUM.COM

206-763-8084

Bill To

Waste Management ASRF 70 South Alaska Street Seattle, WA 98134

Date	Invoice #				
11/17/2011	45061				

Ship To

PUMP AND WASH AS DIRECTED ALASKA ST FACILITY, SEATTLE

P.O. No. Terms

Net 30

Quantity	U/M	Description		Rate	Amount
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Attachment E

Robert Wright Wheel Wash Discharge Documentation

Waste Management Disposal Services of Oregon, Inc.

Date: 1-13-2009

Date: 1-13-2009.



#1. DESCRIPTION: Wastewater from the wheel wash is migrating out the entrance gate. The wheel wash system is just to rear of photographer.



#2. <u>DESCRIPTION:</u> The trucks track out wheel wash wastewater and dirt onto Alaska Street. The storm drain catch basin seen in Photo # 4 is just below and to right of "No Left Turn" sign.

Date: 1-13-2009



#3. <u>DESCRIPTION:</u> This storm drain catch basin is located just outside of entrance gate to the east (and is referred to as the east storm drain). Wheel wash wastewater can be seen flowing into it.



#4. DESCRIPTION: This storm drain catch basin is full of petroleum contaminated muddy water.

Date: 1-13-2009.



#5. <u>DESCRIPTION:</u> A petroleum sheen can clearly be seen on this puddle of water is just outside main gate.



#6. <u>DESCRIPTION:</u> Excessive trackout from the Alaska Street Reload facility onto Alaska Street can be seen.

Date: 1-13-2009.

Date: 3-4-2009.



#7. DESCRIPTION: The facility is aware that the wheel wash system is not adequate to protect water quality and comply with permit requirements.



#8. <u>DESCRIPTION:</u> The storm drain catch basin seen in Photos # 3 & 4 is located is to east (left) of brown pole.

Date: 3-4-2009.

Date: 3-4-2009.



#9. DESCRIPTION: The trucks leaving the facility track contaminated dirt and wheel wash wastewater onto Alaska Street. This catch basin is connected to a storm drainage system that flows to the Duwamish River (also seen in Photo # 26).

Date: 3-4-2009.



#10. <u>DESCRIPTION:</u> Seattle Public Utilities staff are assisting Ecology in the dye testing of the storm drainage system on Alaska Street.

Date: 10-10-2010.



#11. <u>DESCRIPTION:</u> The water seen flowing out of the facility gate is wheel wash wastewater. The discharge of wastewater to surface waters or storm drains is not permitted, as noted in warning letters to Waste Management.



#12. <u>DESCRIPTION:</u> This storm drain catch basin is still receiving wheel wash wastewater from the Alaska Street Reload Facility. This water is contaminated with petroleum and sediment.

Date: 10-10-2010. Date: 10-10-2010.



#13. DESCRIPTION: In response to a complaint about trackout onto Alaska Street, Ecology again found the wheel wash system at this facility to be inadequate.



#14. DESCRIPTION: The wheel wash wastewater flows out the gate and directly into the storm drain catch basin. The storm drain is just under the white striped orange cone. (see also Photo # 15)

Date: 11-16-2011.



#15. <u>DESCRIPTION:</u> This catch basin is referred to as the east storm drain and is receiving muddy petroleum contaminated water. This water smelled like petroleum and had a visible sheen on it.



#16. DESCRIPTION: The storm drain catch basin seen in Photo # 15 is located next to white striped orange cone near the barricade.

Date: 11-16-2011.

Date: 11-16-2011.

Date: 11-16-2011.



#17. <u>DESCRIPTION:</u> The trackout from this facility is again found to be excessive. The muddy road contributes to stormwater pollution of the storm drains on Alaska Street.



#18. DESCRIPTION: The facility is aware of the excessive trackout and inadequate wheel wash system but continues with full operation.

Date: 11-17-2011.



#19. DESCRIPTION: The facility has staff trying to sweep the wheel wash wastewater back into the overflowing wheel wash system. The catch basin seen in Photo # 26 is just beside right front wheel of red truck.

Date: 11-17-2011.



#20. <u>Description:</u> The wheel wash wastewater can clearly be seen flowing out the entrance gate. Most of this flow ends up in the east storm drain.

Date: 11-17-2011.

Waste Management Alaska Street Reload & Recycling Facility

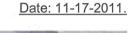


#21. <u>Description:</u> The wheel wash system is located between the staff person and the yellow machine (at the exit of the dirt handling building).



#22. DESCRIPTION: The water in this photo is wheel wash wastewater and is flowing into the east storm drain.

Date: 11-17-2011.





#23. <u>DESCRIPTION:</u> This east storm drain is receiving petroleum contaminated wastewater. A petroleum sheen can be seen on this muddy water and the water smelled of petroleum. Samples were collected at this location.



#24. <u>Description:</u> Petroleum contaminated wastewater has been flowing into storm drains tributary to the Duwamish River from this facility for many days over the past 4 years. The facility has been aware of the inadequacy of the wheel wash system and but failed to implement improvements to comply with permit and water quality requirements.

Date: 11-17-2011.

Date: 11-17-2011.

Waste Management Alaska Street Reload & Recycling Facility





#25. <u>Description:</u> The overflowing wheel wash was resulting in the discharge of wastewater to the east and west storm drains which are tributary to the Duwamish River.

#26. DESCRIPTION: This storm drain catch basin is referred to as the west storm drain and is receiving trackout run-off and wheel wash wastewater.

Date: 11-17-2011.

Date: 11-17-2011.

Attachment F

Quarterly Discharge Monitoring Reports

Waste Management Disposal Services of Oregon, Inc.
(Alaska Street Reload)

WAR004605

Site Name: ALASKA STREET RELOAD & RECYCLING

Site Address:	ite Address: 70 South Alaska Street					Permit Number				Sampling Point		
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Oil Sheen	Yes/No	No visible oil sheen	N/A	N/A	4	Sheen	Present?		D	N/A	N/A	
						Yes / ((10 Jehrcle)	03/	25			
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Zinc, Total	µg/L	117	EPA 200.8	2.5	200	07/02		
Oil Sheen	Yes/No	No visible oil sheen	N/A	N/A	Sheen Present? Yes / 100 (circle)	07/02	N/A	N/A
Copper, Total	µg/L	Western WA: 14	EPA 200.8	2.0	The same of the sa	3		
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my knowledge and bal	d the informa	tion submitted. Based on my inqui rate, and complete. I am aware th	ity of the person or persons wh	o manage the system, or t	hose persons directly respon	sible for gathering	nformation, the information s	ubmitted is, to the best of
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2811 Fairview Avenue East, Suite 2000 Seattle, Washington 98102 Phone: 206.306.1900 * Fax: 206.306.1907 www.soundearthinc.com

November 02, 2010

John Borghese Waste Management of Washington, Inc. 70 South Alaska Street Seattle, WA 98134

SUBJECT:

THIRD QUARTER 2010 STORMWATER MANAGEMENT REPORT

Alaska Street Reload and Recycling Center

70 South Alaska Street Seattle, Washington

Due:

DMRs will need to be submitted no later than November 14, 2010

Dear Mr. Borghese:

On August 31, 2010, representatives of SoundEarth Strategies (SES) collected stormwater discharge samples from the Alaska Street Reload and Recycling Center located at 70 South Alaska Street in Seattle, Washington. Samples were collected in accordance with Industrial Stormwater General Permit #WAR004605 and the existing Stormwater Pollution Prevention Plan.

In accordance with a recent request from the Washington State Department of Ecology (Ecology), SES has averaged the results from samples collected on July 02, 2010 (second quarter) with the results from the August 31, 2010 sampling event (third quarter). We have been collecting samples towards the end of each quarter to be consistent with previous sampling events and representative of the seasonal fluctuations. No stormwater was discharged at the site during the month of June. Samples were collected on July 02, 2010 (2 days after the end of the second quarter) and are considered representative of the second quarter conditions. However, Ecology has requested the July 02, 2010 sample results be combined with the August 31, 2010 sample results to provide an average of the results to be representative of third quarter stormwater conditions. Additionally, Ecology has requested the second quarter Discharge Monitoring Report (DMR) be resubmitted to indicate no sample was collected during the second quarter with an explanation of why. The revised second quarter DMR is attached to this report with a cover letter to Ecology explaining the circumstances of the sampling event.

Stormwater samples were analyzed by TestAmerica Laboratories, Inc., and the results are presented in the attached analytical reports (Attachment B). The averaged results are presented in the summary table below. The pH result is from the August 31, 2010 sampling event.

	PH	Turbidity	Total Copper	Total Zinc
Benchmark	5-9 S.U.	25 NTU	14 μg/L	117 µg/L
Results	7.07	1.9	12	(195)



2811 Fairview Avenue Fast, Suite 2000 Scattle, Washington 98102 Phone: 206.306.1900 • Fax: 206.306.1907 www.soundearthinc.com

Please sign the attached third quarter DMR and the revised second quarter DMR and send them with the cover letter (Attachment A) to the Department of Ecology, Water Quality Program – Industrial Stormwater at PO Box 47696, Olympia, WA 98504-7696 for delivery no later than November 14, 2010.

SES appreciates the opportunity to provide you with these environmental services. Please contact the undersigned directly at (206) 436-5916 if you have any questions or require additional information.

Respectfully,

SoundEarth Strategies, Inc.

Elsa Dowdy

Sr. Project Manager

Attachments: Attachment A - Ecology Cover Letter and Discharge Monitoring Reports

Attachment B - Laboratory Analytical Reports



2811 Fairview Avenue I ast, Suite 2000 Seattle, Washington 98102 Phone: 206.306.1900 • Fax: 206.306.1907 www.soundearthinc.com

ATTACHMENT A

Ecology Cover Letter and Discharge Monitoring Reports



2811 Fairview Avenue Cast, Suite 2000 Scattle, Washington 98102 Phone: 206.306.1900 • Fax: 206.306.1907

November 2, 2010

Charles Gilman
Washington Department of Ecology
Water Quality Program – Industrial Stormwater
PO BOX 47696
Olympia, Washington 98504-7696

SUBJECT:

THIRD QUARTER 2010 AND REVISED SECOND QUARTER 2010 DMRS

Alaska Street Reload and Recycling Center

70 South Alaska Street Seattle, Washington

Dear Mr. Gilman:

On August 31, 2010, representatives of SoundEarth Strategies (SES) collected stormwater discharge samples from the Alaska Street Reload and Recycling Center located at 70 South Alaska Street in Seattle, Washington. Samples were collected in accordance with Industrial Stormwater General Permit #WAR004605 and the existing Stormwater Pollution Prevention Plan.

In accordance with a recent request from the Washington State Department of Ecology (Ecology), SES has averaged the results from samples collected on July 02, 2010 (submitted with second quarter DMR) with the results from the August 31, 2010 sampling event (third quarter). Waste Management (WM) has been collecting samples towards the end of each quarter to be consistent with previous sampling events and representative of the seasonal fluctuations. No stormwater was discharged at the site during the month of June. Samples were collected on July 02, 2010 (2 days after the end of the second quarter) and are considered representative of the second quarter conditions. However, Ecology has requested the July 02, 2010 sample results be combined with the August 31, 2010 sample results to provide an average of the results to be representative of third quarter stormwater conditions. Additionally, Ecology has requested the second quarter Discharge Monitoring Report (DMR) be resubmitted to indicate no sample was collected during the second quarter with an explanation of why. The revised second quarter DMR is attached to this letter with an explanation of the circumstances of the sampling events.

SES and WM appreciate your assistance with this matter. Please contact the undersigned directly at (206) 436-5905 if you have any questions or require additional information.

Respectfully,

SoundEarth Strategies, Inc.

Chris Carter

Sr. Project Manager

Attachments:

Attachment A - Third Quarter Discharge Monitoring Report

Attachment B - Revised Second Quarter Discharge Monitoring Report

Site Name: AL	ASKA STI	REET RELOAD & RECYC	CLING		WAR004605	1		Out Fall	В
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Site Name: AL	ASKA STI	REET RELOAD & RECY	CLING				WAR004605					CUTFAL	LB
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Certification Statement I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personn garnered and evaluated the information submitted. Rased on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.								ubmitted is, to the best of					
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my knowledge and belief, true, accurate, and complete. I am aware that there are	e significant penalties for submitting false information, including the possibility of fin	e and imprisonment for knowing violations.						
John Borghese / District Manager Name / Title (printed)	Signature (not valid unless signed). See Permit Condition G2 for signature requirements.	11/09/10 Date Signed						

Comments:

Waste Management has been collecting samples towards the end of each quarter to be consistent with previous sampling events and representative of the seasonal fluctuations. No stormwater was discharged during the month of June. Samples were collected on July 02, 2010 (2 days after the end of the 2nd Quarter) and are considered representative of the 2nd Quarter conditions. However, the Washington Department of Ecology has requested the July 02, 2010 sample results to be used to average the 3rd Quarter 2010 stormwater conditions. A second 3rd Quarter sampling event occurred on August 31, 2010.



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ATTACHMENT B

Laboratory Analytical Reports



Discharge Monitoring Report (DMR)

Page: 1 of 1

Permit Number: WAR004605

Permittee: ALASKA STREET RELOAD & RECYCLING

Facility County: King

Receiving Waterbody: Puget Sound

Monitoring Period: 10/01/2010 - 12/31/2010

Outfall: 1 - OUTFALL 1

Version: 1

	Monitoring	Turbidity (Nephelometric) Unkaown NTU Quarterly Grab	pH (Hydrogen fon) Unknown Standard Units Guarterly Grab	Oil & Groase Not Applicable Yes/No Quarterly Visual Observation	Copper Total Ugd. Quarterly Grab	Zine, Total Total Total Cuarterly Grab
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5-T	10/26/10	5.4	6.83	No	B <10	190
Average		5.4			B <10	190
A	verage	BM: <= 25			BM: <= 14	BM: <= 117

Non Report Codes Used: B - Below Detection Limit/No Detection

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Jeff Altman

2/10/2011 4:40:22 PM

Signature



Discharge Monitoring Report (DMR)

Page: 1 of 1

Permit Number: WAR004605

Permittee: ALASKA STREET RELOAD & RECYCLING

Facility County: King

Receiving Waterbody: Puget Sound

Monitoring Period: 01/01/2011 - 03/31/2011

Outfall: 1 - OUTFALL 1

Version: 1

	Monitoring	Turbidity (Nephelometric) Measured NTU Quarterly Grab	pH (Hydrogen lon) Not Applicable Standard Units Quarterly Grab	Oil & Grease Not Applicable Yes/No Quarterly Visual Observation	Copper Total Micrograms/L (ug/L) Quarterly Grab	Zinc Total Micrograms/L (ug/L) Gnarterly Grab
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4-F	1/21/11	А	А	No	А	350
		А			А	350
Average		BM: <= 25			BM: <= 14	BM: <= 117

Non Report Codes Used: A - Consistent Attainment Of Benchmark

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Jeff Altman

5/5/2011 4:18:18 PM

Signature



Discharge Monitoring Report (DMR)

Page: 1 of 1

Permit Number: WAR004605

Permittee: ALASKA STREET RELOAD & RECYCLING

Facility County: King

Receiving Waterbody: Puget Sound

Monitoring Period: 04/01/2011 - 06/30/2011

Outfall: 1 - OUTFALL 1

Version: 1

Week	Monitoring Point	Turbidity (Nephelometric) Massured NTU Quarterly Greb	pH (Hydrogen Ion) Standard Units A Quarterly Grab	Oil & Grease Yes/No. - Quarterly Visual Observation	Copper Total Micrograms/L (ug/L) Gratherly Grath	Zinc Total A Micrograms/L (ug/L) Quarterly Grab
9-W	5/25/11	A	А	No	36	570
		- A			36	570
Average		BM: <= 25			BM: <= 14	BM: <= 117

Non Report Codes Used: A - Consistent Attainment Of Benchmark

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Jeff Altman

8/8/2011 10:50:39 AM

Signature



Discharge Monitoring Report (DMR)

Page: 1 of 1

Permit Number: WAR004605

Permittee: ALASKA STREET RELOAD & RECYCLING

Facility County: King

Receiving Waterbody: Puget Sound

Monitoring Period: 07/01/2011 - 09/30/2011

Outfall: 1 - OUTFALL 1

Version: 1

	Monitoring	Turbidity (Nephelometric) Messured NTU Quarterly Greb	pH (Hydrogen len) Standard Units Quarterly Graft	Oil & Grease Yes/No Quarterly Visual Observation	Copper Total Micrograms/L (ug/L) Quarterly Grab	Zinc Total Micrograms/L (ug/L) Quarfarly Grab
Week	Point	1	1	1	1	1
5-M	7/25/11	А	А	No	60	440
Average		А	Range of the second		60	440
		BM: <= 25			BM: <= 14	BM: <= 117

Reporting Codes Used: A - Consistent Attainment Of Benchmark

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Jeff Altman

11/11/2011 10:02:28 AM

Signature



Discharge Monitoring Report (DMR)

Page: 1 of 1

Permit Number: WAR004605

Permittee: ALASKA STREET RELOAD & RECYCLING

Facility County: King

Receiving Waterbody: Puget Sound

Monitoring Period: 10/01/2011 - 12/31/2011

Outfall: 1 - OUTFALL 1

Version: 1

	Monitoring	Turbidity (Nephelometric) Measured NTU Quarterly Grab	pH (Hydrogen fon) Standard Units Quarterly Grab	Oil & Grease Yea/No Quarterly Visual Observation	Copper Total Micrograms/L (ug/L) Quarterly Grab	Zinc Total MicrogramsiL (ug/L) Quarterly Grab
Week	Point	1	1	1	1	1
3-M	10/10/11	А	А	No /	13	170
		А			13	170
Α	verage	BM: <= 25			BM: <= 14	BM: <= 117

Reporting Codes Used: A - Consistent Attainment Of Benchmark

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Jeff Altman

2/10/2012 3:33:07 PM

Signature

Attachment G

Treatment System Information

Waste Management Disposal Services of Oregon, Inc.

(Alaska Street Reload)



CleanWay® Environmental Partners, Inc.

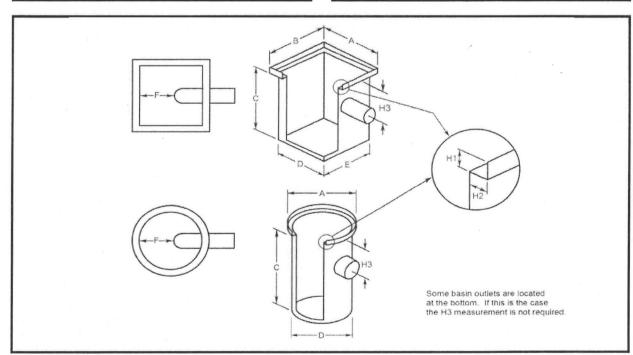
PO Box 30087 10620 NE Marx Street Portland, Oregon 97294

Toll Free 1-800-723-1373 Tel 503-280-5102 Fax 503-288-3658 www.cleanwayusa.com

Sizing Chart for Filtration Inserts

Square/Rectangular	Measurement
"A" Width	24"
"B" Length	18"
"C" Overall Depth	32"
"D" Inside Width	
"E" Inside Length	
"F Clearance to Outlet Baffle	
"H1" Height	
"H2" Length	
"H3" Outlet Center to Top	

Round	Measurement
"A" Lip Diameter	
"C" Overall Depth	
"D" Inside Diameter	
"F Clearance to Outlet Baffle	
"H1" Height	
"H2" Length	
"H3" Outlet Center to Top	



Sizing for Adsorption Booms

Available in 6, 8 and 10 foot lengths

Length:	
Lengur.	

Notes

Add your notes or special instructions.

Indicate additional inlets (size and location) or other uncommon features.



CleanWay® Environmental Partners, Inc.

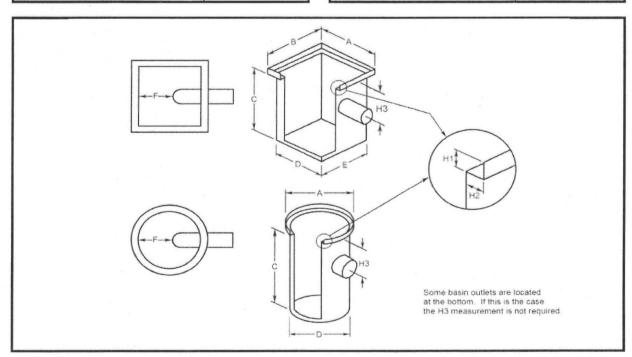
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Sizing Chart for Filtration Inserts

Square/Rectangular	Measurement
"A" Width	24"
"B" Length	20"
"C" Overall Depth	32"
"D" Inside Width	
"E" Inside Length	
"F Clearance to Outlet Baffle	7
"H1" Height	
"H2" Length	
"H3" Outlet Center to Top	

Round	Measurement
"A" Lip Diameter	
"C" Overall Depth	
"D" Inside Diameter	
"F Clearance to Outlet Baffle	
"H1" Height	
"H2" Length	
"H3" Outlet Center to Top	



Sizing for Adsorption Booms

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Notes

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